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TIJUANA, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUDI JIMENEZ,

Plaintiff,

vs.

TIJUANA, LLC, d/b/a ADVANCE MEDICAL
STAFFING, d/b/a RAPID TEMPS, INC., a
domestic limited liability company; DOES I-X;
and ROE BUSINESS ENTITIES I-X,
inclusive,

Defendants.

Case No.: 2:20-cv-00765-RFB-VCF

**STIPULATION TO EXTEND DEADLINE
FOR DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED by and between Plaintiff RUDI JIMENEZ ("Plaintiff"), through her counsel, MAIER GUTIERREZ & ASSOCIATES, and Defendant, TIJUANA, LLC d/b/a ADVANCE MEDICAL STAFFING, d/b/a RAPID TEMPS, INC. ("Defendant"), by and through its counsel, Jackson Lewis P.C., that Defendant shall have an extension up to and including June 10, 2020, in which to file its response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed her Complaint on April 28, 2020. ECF No. 1. Defendant was served with the Summons and Complaint on April 29, 2020. ECF No. 6.

2. Defendant's response to the Complaint is currently due on May 20, 2020.

1 3. Counsel for Defendant was recently retained in this matter. Due to the press of
2 other matters, including adjustments made necessary by the COVID-19 pandemic, and in order to
3 fully respond to the pleading, Defendant requires additional time to respond to the Complaint.
4 Defendant accordingly requests an extension, up to and including June 10, 2020, to file its
5 responsive pleading.

6 4. This is the first request for an extension of time for Defendant to file a response to
7 Plaintiff's Complaint.

8 5. This request is made in good faith and not for the purpose of delay.

9 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
10 as waiving any claim and/or defense held by any party.

11 Dated this 20th day of May, 2020

12 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

13 /s/ Danielle J. Barraza

/s/ Lynne K. McChrystal

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Attorneys for Defendant

Attorneys for Plaintiff Rudi Jimenez

24 **ORDER**

25 IT IS SO ORDERED.



26 U.S. Magistrate Judge

27 Dated: 5-27-2020